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OFFICE OF THE  
EXECUTIVE SECRETARY

Jim Lamoureux  
Attorney  
Law and Government Affairs  
Southern Region  
jlamoureux@att.com

Promenade 1  
1200 Peachtree Street N.E.  
Atlanta, GA 30309  
404 810 4196  
FAX: 404 810 5901

July 1, 1999

**By [HAND]**

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Docket No. 99-00280*  
*Revised AT&T-TCG Toll Dialing Parity Implementation Plan*

Dear Mr. Waddell:

Please find enclosed for filing the original and 13 copies of AT&T's and TCG's Revised Toll Dialing Parity Implementation Plans, along with AT&T's Petition for Waiver.

Sincerely,

A handwritten signature in cursive script that reads "Jim Lamoureux".  
Jim Lamoureux

Encls.

## **TCG Dialing Parity Implementation Plan**

TCG hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth TCG's proposal for providing intraLATA toll dialing parity within the state of Tennessee for customers subscribing to TCG services.

**Methodology:** TCG will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing TCG customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk. TCG will also provide a "No PIC" feature, allowing customers the capability to "dial around". TCG will convert all its central offices on a statewide basis.

**Availability:** TCG will provide full 2-PIC dialing parity in each LATA and exchange in which TCG provides service. TCG local service is offered in all exchanges and LATAs in Tennessee in which TCG is authorized to provide local and intraLATA toll services.

**Subscriber Practices:** TCG will inform new TCG local service customers of the dialing parity feature and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area.

TCG will utilize competitively neutral business office practices when an existing TCG customer contacts TCG to request information on dialing parity or to change to an alternate intraLATA toll. Upon request, TCG will provide customers a randomly ordered list of carriers available to them in their geographic area. New customers who do not make a positive choice for an intraLATA toll carrier will be notified that they will not be automatically defaulted to a carrier and will be required to dial an access code to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier. In addition, unless an existing TCG subscriber requests a change to their presubscribed intraLATA toll carrier ("PTC"), their intraLATA toll traffic will remain with their existing PTC.

TCG will accept customer-initiated or carrier-initiated requests for alternate intraLATA toll carriers on the date of implementation. If all necessary access facilities already exist, the PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the TCG switch to the IXC or from the customer premises to the TCG switch) be required, the PTC selection will be completed within

three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, TCG will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PTC selection.

TCG will provide notice to its subscribers of the forthcoming availability of intraLATA toll dialing parity by means of a one-time mailing, a copy of which is attached as Exhibit 1. This mailing will be sent 15 days prior to the implementation of dialing parity, provided that at least one ASR has been received from an alternate carrier.

**Carrier Practices:** Any interexchange carrier that wishes to be listed as a provider of intraLATA toll service at the time of dialing parity implementation shall notify TCG no later than 30 days prior to dialing parity availability. Interexchange carriers that wish to offer intraLATA toll service to TCG local customers must establish direct interconnection of its network with the TCG network. Other Access Service Request ("ASR") requirements are available from the TCG Carrier Service Center. TCG will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals. TCG will not implement a cost recovery plan at this time.) In addition, TCG will not impose a PIC Change Charge on customers. In keeping with the TRA's anti-slamming rules, TCG will adhere to the TRA anti-slamming rules and implement a PIC freeze moratorium for 180 days. TCG will comply with all rules imposed by the FCC and the TRA.

**Proposed Implementation Schedule:** TCG will implement dialing parity no later than 30 days after the date of the Order in which this plan is approved.

Exhibit 1

Date

Dear Customer,

As a valued TCG customer we are pleased to announce an enhancement to your TCG service: the availability of intraLATA toll pre-subscription. Pre-Subscription gives you the opportunity to choose an alternate carrier to complete your intraLATA toll calls.

TCG currently completes your intraLATA toll calls, and will continue to do so unless you choose otherwise.

Other companies will solicit your intraLATA toll business. Before making a change, however, please remember that each company's rates, plans and policies are different. If you wish to make a change, please contact our customer service center. You should also contact the intraLATA toll company you have chosen to ensure your account is properly established. This feature is available to you effective [insert date]. TCG will not impose any charges for this feature.

As always, we are grateful for your continued business. If you have any questions or wish to make a change, please contact our business office at 1-888-227-3824 on or after [insert date].

Sincerely,